

as being anticipated by Lee et al. (USPN 6,220,880) is hereby traversed insofar as such rejection may be applied to added independent Claims 25 and 30 and to Claims 26-29 and 30-34 depending respectively therefrom.

Applicants' objection that certain wording in the preamble has not been given patentable weight as "the preamble is denied the effect of a limitation where the claim is drawn to a structure and the portion of the claim following the preamble is a self contained description of the structure not depending for completeness upon the introductory clause." Applicants submit that such action is overcome by the redrafting of the added claims to positively recite what was previously included in the preamble.

The Examiner asserts that: "Lee et al. discloses a new power outlet connector...comprising a body portion and a shoulder portion, the body portion configured for fitting into a standard cutout for a conventional power outlet connector..." However, Applicants assert that this is not, in fact, disclosed in Lee et al., but is a quote from Applicant's application. Lee et al. does not use the terms "standard cutout" or "conventional power outlet" anywhere in their patent. Lee et al cannot use a standard cutout, they must use a socket holder. Lee et al. disclose a modular system of outlets that must be snapped into a common socket holder, where the socket holder is new and is part of the invention itself.

In contrast, Applicants' added independent Claims 25 and 30 require an electrical equipment enclosure formed having a standard, IEC-sized cutout for receiving an IEC AC power outlet connector and requires a modified NEMA-type AC power having a body region shaped to match the standard IEC-sized IEC AC power outlet connector cutout. Lee et al. neither discloses or even suggests use of an electrical

equipment enclosure, much less one having a standard, IEC-sized cutout for receiving an IEC AC power outlet connector.

Nor does Lee et al. disclose or even suggest modifying a NEMA-type AC power having a body region shaped to match the standard IEC-sized IEC AC power outlet connector cutout.

Thus, Applicants claim a new NEMS outlet connector series that fit into an industry standard enclosure IEC connector cutout.

Applicants' added dependent claims are limited to specific IEC and NEMA types of AC power outlet connectors, none of which are disclosed in Lee et al.

On the basis of the foregoing, Applicants' assert that their added Claims 25-34 are not anticipated within the meaning of 35 USC 102(e).

REJECTION OF CLAIMS 2-19 and 21-24 UNDER 35 U.S.C. 103(a):

The Examiner's rejection of Claims 1 through 24 (page 3, Par. 4 of the Office Action) under 35 U.S.C. 103(a) as being unpatentable over Lee et al. (USPN 6,220,880) is hereby traversed insofar as such rejection may be applied to all or any of added Claims 25-.

Applicants' above-discussion regarding independent Claims 1 and 20 relative to the Examiner's rejection under 35 U.S.C. 102(e) on Lee et al. is incorporated by reference at this point. Applicants submit that their argument set forth above to overcome the Examiner's rejection of independent Claims 1 and 20 under 35 U.S.C. 102(e) on Lee et al. is equally applicable to the Examiner's rejection under 35 U.S.C. 103(a) on Lee et al., since the Lee et al. reference neither discloses nor teaches or even suggests Applicants' invention claimed in added Claims 25-34.

Again, Applicants submit that Lee et al. neither teaches nor suggests the modification of NEMA-type AC power

outlet connectors to fit into standard IEC-sized AC power outlet connector cutouts in electrical equipment enclosures. In fact, Lee et al. teaches away from Applicants' requirement for modified NEMA-type AC power outlet connectors that fit into standard IEC-sized AC power outlet connector cutouts in electrical equipment enclosures since Lee et al requires special, new sockets for receiving their electrical connectors.

Applicants wish to point out that their claimed invention serves a long-standing problem that has heretofore not been solved. The strength of Applicants invention is the ability to use the same sheet metal enclosure for multiple types of equipment, thereby reducing the cost of enclosures which constitute the most expensive part of the equipment. This cost reduction is possible since enclosure costs are based on quantities ordered and if combined numbers of IEC and NEMA enclosures are ordered as IEC enclosures considerable procurement savings are realized over smaller separate orders of IEC and NEMA enclosures.

As a specific example, if in a particular month 25 IEC versions and 25 NEMA versions were sold, the cost of each single type of enclosure in quantities of 25 would about \$85 each; thus for two 25 unit orders of the two different enclosures, the total cost would be about \$4250. The claimed design enabling the order of 50 of one combined type enclosure would result in a unit cost of only \$50, or a total cost of only about \$2500—a cost savings of about 41%. This cost savings could then be passed onto the customers making the products more competitive in the market.

In contrast, The design disclosed by Lee et al. requires all custom parts and would consequently double or triple the cost of units at the quantities mentioned.

Applicants also submit that tooling to produce the

modified NEMA 5-15 AC power outlet connector is completed and such modified NEMA-type connector is in the approval process.

Applicants assert that their satisfying of a long-felt, unsatisfied need is an important indicia of non-obviousness.

Based on the foregoing, Applicants submit that all of added claims 25-34 are independently patentable under 35 U.S.C. 103(a) on Lee et al.

SUMMARY

Based on the foregoing, Applicants submit that all added Claims 25-34 are patentable over Lee et al., and allowance of all such claims is solicited from the Examiner.

Respectfully submitted,


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